

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LAMBDA OPTICAL SOLUTIONS LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ALCATEL-LUCENT SA, <i>et al.</i> ,	)	C.A. No. 10-487-RGA-CJB
	)	
Defendants.	)	
	)	
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ALCATEL-LUCENT USA INC. and	)	
ALCATEL-LUCENT HOLDINGS INC.,	)	
	)	
Counter-Claimants,	)	
	)	
v.	)	
	)	
LAMBDA OPTICAL SOLUTIONS LLC,	)	
LAMBDA OPTICAL SYSTEMS CORP., and	)	
ANASTASIOS TZATHAS,	)	
	)	
Counter-Defendants.	)	

**DEFENDANTS ALCATEL-LUCENT USA INC. AND  
ALCATEL-LUCENT HOLDINGS INC.'S MOTION FOR  
SUMMARY JUDGMENT OF NON-INFRINGEMENT**

Defendants Alcatel-Lucent USA Inc. and Alcatel-Lucent Holdings Inc. (collectively, “Alcatel-Lucent”) respectfully move for summary judgment, under FED. R. CIV. P. 56, that they do not infringe asserted claims 1, 2, 4-9, 11-16, 18, and 23-26 of U.S. Patent No. 6,973,229. The grounds for this motion are set forth in Alcatel-Lucent’s Opening Brief In Support of Their Motion for Summary Judgment of Non-Infringement, which is being filed contemporaneously herewith.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Andrew E. Russell, hereby certify that on November 26, 2013, this document was caused to be served on the persons listed below in the manner indicated:

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